

HSRW-6J

VIA FAX AND MAIL May 6, 1994

Mr. Jim Myers Environmental Response Division Michigan Department of Natural Resources 301 S. Capitol Lansing, MI 48933

Re: Test Pitting Work Plan for Albion-Sheridan Township Landfill

Dear Jim:

Thank you for sharing with us ABB's final work plan for test pitting at the Albion-Sheridan landfill. I have two remaining concerns: timing and disposal. Considering the delays in getting field operations underway, I hope you can arrange to have some analytical work done very quickly. Although we originally had scheduled it sooner, the Proposed Plan could be released as late as June 30 and still meet our September 30 deadline for a ROD. At the time of our dispute resolution this past winter, it appeared that test pitting could be completed prior to the proposed plan stage and I hope that is still the case.

The work plan calls for decontamination fluids, used personal protective gear, and overpacked drums, if any, to be stored on site for later disposal. I would like a clear understanding between our agencies that the MDNR is responsible for that disposal. This was discussed during the dispute resolution process. As we have indicated in the past, U.S. EPA does not plan to remove drums other than those intact drums uncovered during grading, unless you find intact drums of hazardous waste of a quantity (perhaps "hundreds") that we consider would significantly affect the remedy.

I'm sure you are also aware of RCRA's 90-day limit on storage of hazardous materials on site.

If you have any questions, feel free to call me at (312) 886-4696.

Sincerely,

Leah H. Evison Remedial Project Manager

cc: Mary Pat Tyson